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SERISS (Synergies for Europe's Research Infrastructures in the Social Sciences) aims to exploit synergies, foster collaboration and develop shared standards between Europe's social science infrastructures in order to better equip these infrastructures to play a major role in addressing Europe's grand societal challenges and ensure that European policymaking is built on a solid base of the highest-quality socio-economic evidence.

The four year project (2015-19) is a collaboration between the three leading European Research Infrastructures in the social sciences – the European Social Survey (ESS ERIC), the Survey for Health Aging and Retirement in Europe (SHARE ERIC) and the Consortium of European Social Science Data Archives (CESSDA AS) – and organisations representing the Generations and Gender Programme (GGP), European Values Study (EVS) and the WageIndicator Survey.

Work focuses on three key areas: Addressing key challenges for cross-national data collection, breaking down barriers between social science infrastructures and embracing the future of the social sciences.

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Guidelines for the use of this letter and the memo

The letter and memo presented here are intended to serve as a **template** for researchers working on high-quality national or cross-national social surveys and seeking access to national population registers for sampling purposes. The current template is for a memo sent jointly by the directors of the four major cross-national surveys that are part of SERISS and making the joint case for sample access for these surveys (**scenario 3** as described below). However, the letter and memo can be used in different ways as described below. The text and signatories of the letter **can be adapted accordingly** to specific national contexts and data protection cultures (including for use in non-EU countries where GDPR is not the primary legislation)¹. Please also read SERISS Deliverable 2.3a “*Background to the letter to request access for sampling for European survey infrastructures*” (Scherpenzeel, 2018) to be informed about the choice of the arguments included in the letter and memo.

The letter and memo can be used in the following ways:

1. Country teams of each survey can individually use the template letter as an example for the formulation of their own specific letter with appropriate adaptations, sign it themselves or with the director of their survey, and send it to the register they want to use, including the general memo. In addition, a country team could also ask national funders, e.g. ministries, to sign and/or send the (adapted) letter.
2. Country teams across (some of) the four surveys can jointly send the letter, with specific adaptations where needed, to the register in their country signed by the directors of the (up to four) surveys and including the general memo. National funders of any of the participating surveys could also be asked to (co-)sign the letter or send it themselves.
3. The central management teams of the four surveys can together select a number of countries in which they want to make a joint, central effort to improve the sampling situation and send the letter and memo signed by all four directors (possibly signed in addition by the country leaders).
4. The SERISS sampling expert network can extend the letter to include more surveys and stakeholders, and send the letter and memo to Eurostat and/or try to get it published as an open letter on the Eurostat website.
5. The letter and memo will be published on the SERISS website, providing the opportunity to other survey researchers to consult it and use it as basis for their own efforts to convince register authorities, in Europe and elsewhere, to allow sample drawing from the population registers.

We kindly request any team, organisation or researcher to inform us if and how they used the letter. In this way we can keep track of its usefulness and effect. Please email to: seriss@city.ac.uk

¹ Terminology should also be adapted to specific national contexts/languages where necessary, for example the name „GDPR“.

Letter and memo

Concerns: The use of population person registers for sample drawing for large cross-European scientific surveys

To: [Insert name of register authority or advising body]

We, the directors of four major cross-European scientific surveys, have the honour to present to you the enclosed memorandum, which explains our position regarding the use of [NAME OF REGISTER] for drawing samples for scientific research. The study(s) we represent are academically-driven, trustworthy, pursue the highest scientific quality standards and have strict ethics and data protection safeguards. We enjoy a strong reputation in the national and international social science community and have a responsibility to provide non-misleading statistics and sound scientific research for the benefit of science, society, policy, and citizens.

The high academic standards we apply in our cross-European surveys demand excellent sampling preconditions. Our studies aim to fully represent the study-relevant European population in all included countries, among which [COUNTRY]. Our memorandum explains why access to [NAME OF REGISTER] as a sampling frame for scientific cross-European research is essential, and provides reassurance that the conditions for providing personal data from registers for scientific sampling purposes are met. The memo describes:

1. The current situation regarding the use of person registers for scientific sampling across European countries
2. Compliance of the use of person register information for scientific samples with the European General Data Protection Regulation (EU-GDPR), which applies in all EU Member States - and for countries looking to transfer data to the EU - as of 25 May 2018
3. The responsibility of scientists to ensure citizens' right to privacy protection and freedom of choice
4. How citizens benefit from high quality academic research that produces reliable statistics

The majority of person population registers in European countries *do* provide access to person data for the sample drawing in our four large cross-European scientific studies, as is described in the memo. The situation in [COUNTRY] regarding data protection and citizen rights is not different than in these other European countries. We therefore would be happy to receive your confirmation that the scientific national teams of [NAMES OF RELEVANT SURVEY(S)] can use [NAME OF REGISTER] for drawing a sample.

With the help of the population registers across Europe, we can build a sustainable relationship between citizens and science and create meaningful research that serves society and policy.

Prof. Axel Börsch-Supan, Director

The Survey of Health, Ageing, and Retirement in Europe (SHARE)

Prof. Ruud Luijkx, Chair of Methodology

The European Values Study (EVS).

Prof. Anne Gauthier, Director

The Gender and Generations Program (GGP)

Prof. Rory Fitzgerald

The European Social Survey (ESS).



Memorandum concerning the use of population person registers for sample drawing for scientific surveys

Representing:

The European Social Survey (ESS), the Generations & Gender Programme (GGP), the Survey of Health, Ageing and Retirement in Europe (SHARE), and the European Values Study (EVS).

Introduction

The aim of most high quality scientific surveys is to be able to draw inferences about a specific population by using a sample that is a proper representation of that population. In the ideal case, a probability-based sample is drawn from an official person register covering the population of interest. This is especially important for cross-national surveys such as [INSERT NAME OF SURVEYS]. The samples in each country must do justice to national specificities but at the same time be internationally comparable.

The objective of this memorandum is to present:

- A short overview of the current situation regarding the existence of person registers across European countries and the use of these registers for the four largest cross-national scientific surveys in Europe
- An explanation how the use of person register information for scientific sample drawing complies with the European General Data Protection Regulation (EU-GDPR)
- A description of how the citizen's right to privacy protection and freedom of choice is preserved by the high scientific standards of the surveys involved
- Evidence that citizens benefit from high quality academic research that is based on representative samples from a reliable person register

The following sections elaborate these four essential points for the use of data from official person registers to draw samples for scientific studies.

1. Overview of access to registers in European countries for scientific samples

The majority of person population registers in European countries *do* provide access to person data for the sample drawing in our four large cross-European scientific studies. This was shown in an inventory commissioned by the EU Commission in the framework of the EU Horizon2020 project "Synergies for Europe's Research Infrastructures in the Social Sciences" (SERISS)². This beneficial situation exists in Austria, Belgium, Denmark, Estonia, Finland, France, Germany, Hungary, Iceland, Italy, Luxembourg, Netherlands, Norway, Poland, Slovenia, Spain, Sweden and Switzerland.

In only a few countries in which a population register is known to exist do our scientific cross-European surveys not get access to use it for sample drawing. In general, the situation regarding data protection and citizen rights in those countries [including NAME OF COUNTRY] is not different from the countries listed above, so access could be given in the same way as in all other countries. Moreover, the comparability of the data in our cross-European scientific surveys is of utmost importance for the quality of the statistics and policy advice that are based on it, and hence to the benefit of each countries' citizens. This comparability can only be guaranteed by using the same probability basis for sampling in all countries as is already provided by the majority of European countries.

² Scherpenzeel et al. (2016). *Report on the use of sampling frames in European studies*. Deliverable 2.1 of the SERISS project funded under the *European Union's Horizon 2020 research and innovation programme* GA No: 654221. Available at: www.seriss.eu/resources/deliverables

2. The use of person register information for scientific sample drawing complies with the European General Data Protection Regulation

The four large cross-European surveys involved in this memo all work with scientific partner institutions and commission the implementation of the interviews to local survey agencies in the countries. Between these parties exists a clear and written down identity of controllers, processors, and recipients of the data. All parties involved place particular importance on the compliance with European and national data protection law. As of 25 May 2018, this is the European General Data Protection Regulation (EU-GDPR, Regulation (EU) 2016/679) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, which now applies in all EU Member States.

In particular with regard to the use of personal data from registries, the EU-GDPR Regulation states (Recital 157, 5): "In order to facilitate scientific research, personal data can be processed for scientific research purposes, subject to appropriate conditions and safeguards set out in Union or Member State law". The safeguards and data protection measures of all four surveys are aligned with the regulation, as is described below. These conditions hence allow registers to provide names and addresses of a sample of the population in the register, compliant with the EU-GDPR, to the four scientific surveys for scientific research purposes. The contacts and interviews with the persons in the samples are carried out by specialized research agencies which implement all the specified safeguard measures, are bound to comply with the EU-GDPR too, and are closely controlled by the academic research institutes that lead the surveys.

Strict procedures necessary to ensure data privacy, aligned with the EU-GDPR regulation, are followed by each of the four surveys, such as:

- Separation of address data from the interview data as early as possible
- Application of adequately secure technical and organisational measures in order to protect the hardware and software used in the course of data collection and processing against unauthorised access
- Implementation of suitable anonymization techniques
- Clear privacy-oriented data release and use policy.

3. The citizen right for privacy protection and freedom of choice is treasured

In all high quality scientific surveys, very strict procedures are in place to protect the personal data of participants, safeguard their privacy and their freedom of choice. The universities and scientific partners involved in the four cross-European studies that have written this memorandum are of well-known reputation, trustworthy and have strict deontological ethics. In addition, the quality of survey data depends on the willingness of the public to voluntarily participate in such surveys which in turn depends on the trust people have in scientific studies. Therefore, scientists are themselves very motivated to protect privacy and citizens' rights.

The names and addresses obtained for a random sample of people from the register will be used to contact people and ask them whether they want to participate in an interview for scientific purposes. Only persons who wish to participate will be interviewed. The information given to respondents at the first contact is in accordance with the specification in article 13 of the GDPR. They have the right to object to our processing of personal data, to access, rectify and erase any information, and to ask us what information we hold. Storage of name and contact information is limited to what is necessary in relation to the purposes of the studies, and will be deleted at the end of each study.

The citizen confirms her voluntary participation at different moments during an interview contact, and during the survey there are numerous options to protect privacy by the citizen himself, for example by choosing not to answer certain questions in the interview. The respondent's freedom to participate, withdraw, or not answer questions is explicitly made clear in all four cross-European surveys.

Finally, we would like to underline that the citizen's freedom of choice also means being given the opportunity to choose to take part in a Europe-wide important survey and voice their opinions.

4. Citizens benefit from reliable scientific research based on representative samples from a population register

The four scientific European surveys involved in this memo are conducted in the public interest. They are funded by (EU and national) public money, meaning these studies have a responsibility to provide non-misleading statistics and sound scientific research. Only the use of a person population register allows the creation of a true probability sample which is the basis of representativeness. With the help of the population registers across Europe, we can build a sustainable relationship between citizens and science and create meaningful research that serves society and policy.

Countries that have a person register are in a very favourable situation, as this opens the possibility to use the best possible sample. Samples that are constructed in a different way will have larger design effects and sampling error, leading to distortions in the data and in resulting statistics. Surveys that are based on highly self-selective samples, without any information about non-response, can result in misleading statistics, which are not to the benefit of citizens and policy-makers. On the basis of a high -quality probability population sample with equal selection probabilities for all registered persons, researchers can correct for non-participation and systematic bias and ensure that the final data accurately represent the views of the target population.